REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the remarks herewith.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-13 and 15 are currently pending. Claims 1, 5 and 10 are independent. Claim 14 was previously canceled.

II. REJECTIONS UNDER 35 U.S.C. §102(e)

Claims 1-13 and 15 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,081,278 to Chen.

Claim 1 recites, *inter alia*:

"...generating feature data corresponding to said scenes ...

wherein said feature data is described using descriptors each having its attributes defined as lower-level elements." (emphasis added)

As understood by Applicants, U.S. Patent No. 6,081,278 to Chen relates to an apparatus and method for storing an animation. A set of keyframes created from a video is stored in an animation object. Values that indicate a first sequence of selected keyframes from the set of keyframes is stored in the animation object along with information for interpolating between the keyframes of the first sequence. Values that indicate a second sequence of selected keyframes from the set of keyframes is also stored in the animation object along with information for interpolating between the keyframes of the second sequence. The number of keyframes in the second sequence is fewer than the number of keyframes in the first sequence. (See Abstract)

Applicants submit that nothing has been found in the cited portions of U.S. Patent No. 6,081,278 to Chen (hereinafter, merely "Chen") that would disclose or suggest the above-identified features of claim 1.

Specifically, claim 1 recites, "…generating feature data corresponding to said scenes". Applicants submit that the disclosure in Chen of an animation object generator 29 does not anticipate the claimed generating feature. Chen discloses that the animation object generator 29 receives the background track 33 from the background track generator 25 and the zero or more object tracks 35 from the object track generator 27 and writes the tracks to an animation object 30. The animation object 30 may be formatted to include multiple temporal and spatial resolutions of the background track and object tracks. (See Chen, column 6, lines 37-41.) Applicants submit that this disclosure does not anticipate the above-identified feature of claim 1.

Furthermore, claim 1 recites, "…wherein said feature data is described using descriptors each having its attributes defined as lower-level elements". Applicants submit that this feature is not disclosed in Chen. Indeed, the disclosure in Chen of a series of frames, (54A, 54B and 54C) does not anticipate the above-identified feature of claim 1.

Therefore, Applicants submit that claim 1 is patentable.

Independent claims 5 and 10 are similar in scope and believed to be patentable for similar reasons.

III. DEPENDENT CLAIMS

Claims 2-4, 6-9, 11-13 and 15 are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however,

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the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, it is respectfully requested that the Examiner specifically indicate those portions of the reference providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,
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